

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03-MD-01570 (GBD)(FM) ECF Case
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*This document relates to: All Actions*

DECLARATION OF JERRY S. GOLDMAN  
IN SUPPORT OF MOTION TO WITHDRAW DARIN J. MCMULLEN,  
MARK E. GOTTLIEB AND WILLIAM H. PILLSBURY AS ATTORNEYS OF RECORD

1. I am a member of the law firm of Anderson Kill & Olick, P.C. ("AKO"), attorneys for the Plaintiffs in *Estate of John P. O'Neill, Sr., et al. v. Al Baraka Investment & Development Corp., et. al.* 04-CV-1923 (GBD) (FM), *Estate of John P. O'Neill, Sr., et al. v. Republic of Iraq, et al.* 04-CV-1076 (GBD) (FM), and *Estate of John P. O'Neill, Sr., et al. v. Kingdom of Saudi Arabia, et al.* 04-CV-1922 (GBD)(FM) (collectively "O'Neill Plaintiffs"), and serve on the Plaintiffs' Executive Committee for Personal Injury and Death Claims in all of the actions consolidated in the captioned proceedings.

2. I am familiar with the proceedings in this case. I have been lead counsel for the O'Neill Plaintiffs since the inception of this Action in the Southern District of New York. I make this statement in support of the law firm of AKO's motion to withdraw Darin J. McMullen, Mark E. Gottlieb and William H. Pillsbury as attorneys of record for the O'Neill Plaintiffs in the above captioned matter.

3. Darin J. McMullen is no longer affiliated with the law firm of AKO.

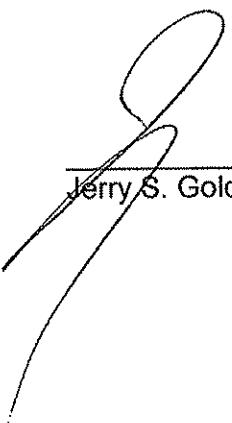
4. Mark E. Gottlieb is no longer affiliated with the law firm of AKO.

5. William H. Pillsbury is no longer affiliated with the law firm of AKO.

6. For the foregoing reasons, the undersigned respectfully requests that this Court grant the law firm of AKO leave to withdraw Darin J. McMullen, Mark E. Gottlieb and William H. Pillsbury as attorneys of record in the above captioned matter. A proposed Order is attached for the Court's convenience.

7. I certify that all of the forgoing statements made by me are true, and I am aware that if any of the foregoing statements made by me are willfully false, I am subject to punishment.

Dated: November 23, 2009

  
\_\_\_\_\_  
Jerry S. Goldman

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

IN RE TERRORIST ATTACKS ON SEPTEMBER 11, 2001	03-MD-01570 (GBD) (FM) ECF Case
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*This document relates to: All Actions*

**ORDER TO WITHDRAW DARIN J. MCMULLEN,  
MARK E. GOTTLIEB AND WILLIAM H. PILLSBURY AS ATTORNEYS OF RECORD**

Before the Court is the Motion to Withdraw Darin J. McMullen, Mark E. Gottlieb and William H. Pillsbury as Attorneys of Record as counsel for Plaintiffs in *Estate of John P. O'Neill, Sr., et al. v. Al Baraka Investment & Development Corp., et. al.* 04-CV-1923 (GBD) (FM), *Estate of John P. O'Neill, Sr., et al. v. Republic of Iraq, et al.* 04-CV-1076 (GBD) (FM), and *Estate of John P. O'Neill, Sr., et al. v. Kingdom of Saudi Arabia, et al.* 04-CV-1922 (GBD)(FM) (collectively "O'Neill Plaintiffs").

It is ORDERED that Darin J. McMullen, Mark E. Gottlieb and William H. Pillsbury be withdrawn as counsel for the O'Neill Plaintiffs in the above-referenced action.

It is further ORDERED that all other counsel listed in the record of the law firm of Anderson, Kill & Olick, P.C. will continue to represent the O'Neill Plaintiffs in this matter.

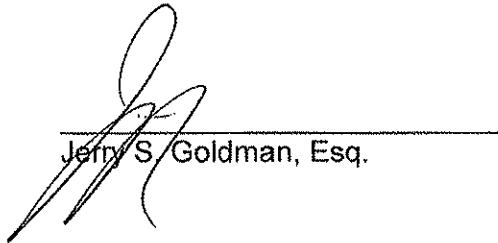
Signed this \_\_\_\_ day of \_\_\_\_\_, 2009

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GEORGE B. DANIELS  
UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that a true copy of the Motion to Withdraw Darin J. McMullen, Mark E. Gottlieb and William H. Pillsbury as Attorneys of Record was served via the Court's Electronic Case Filing system, on November 23, 2009, upon all counsel of record.



Jerry S. Goldman, Esq.